

Filed: 7/24/2014 2:26:35 PM
Andrea S. Thompson
District Clerk
Collin County, Texas
By Lucy Van De Loo Deputy
Envelope ID: 1935170

CAUSE NO. 429-02722-2014

A. T.	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
vs.	§	_____ JUDICIAL DISTRICT
	§	
MIKE RIBEIRO and	§	
TAMARA WILLIAMS,	§	
	§	
Defendants.	§	COLLIN COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

COMES NOW, A. T., Plaintiff, complaining against Defendants, MIKE RIBEIRO and TAMARA WILLIAMS and, in support thereof, would respectfully show unto the Court the following:

**I.
DISCOVERY CONTROL LEVEL & TRCP 47 STATEMENT**

1. Plaintiff intends that discovery be conducted under Discovery Level 3, pursuant to the Texas Rules of Civil Procedure.
2. Plaintiff seeks monetary relief over \$1,000,000.00.
3. Plaintiff demands judgment for all other relief to which Plaintiff is deemed to be entitled.

**II.
JURISDICTION AND VENUE**

4. Jurisdiction is proper in this Court over Defendants, because one or more of the Defendants resides in the State of Texas and the actions complained of occurred in the State of Texas. Venue is appropriate in Collin County, Texas.

**III.
PARTIES**

5. Plaintiff is an individual who resides in Collin County, Texas.

PLAINTIFF'S ORIGINAL PETITION



6. Defendant MIKE RIBEIRO is an individual who, upon information and belief, resides in Collin County, Texas, Scottsdale, Arizona and may soon reside in the Nashville, Tennessee area. Defendant RIBEIRO should be served with process wherever he may be found. No process is requested at this time.

7. Defendant TAMARA WILLIAMS is an individual who, upon information and belief, resides in Collin County, Texas, Scottsdale, Arizona and may soon reside in the Nashville, Tennessee area. Defendant WILLIAMS should be served with process wherever she may be found. No process is requested at this time.

IV. DAMAGES

8. Defendant MIKE RIBEIRO assaulted Plaintiff. Defendant RIBEIRO acted intentionally, knowingly and recklessly when he made contact with Plaintiff's person. The Defendant's contact caused bodily injury to Plaintiff and Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

9. Defendant TAMARA WILLIAMS has made recent inappropriate comments and/or threats about and against Plaintiff, which have been communicated to Plaintiff. Defendant's comments and behavior have caused injury to Plaintiff and Plaintiff has been damaged in an amount within the jurisdictional limits of this Court.

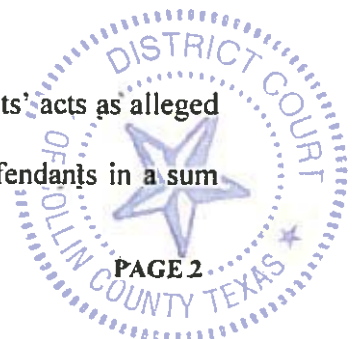
V.

EXEMPLARY DAMAGES

10. Plaintiff hereby incorporates and realleges the matters set forth in the preceding paragraphs as if set forth at length.

11. Due to the deliberate, willful, and malicious nature of Defendants' acts as alleged above, Plaintiff seeks and is entitled to recover exemplary damages from Defendants in a sum

PLAINTIFF'S ORIGINAL PETITION



within the jurisdictional limits of the Court.

VI.

DEMAND FOR JURY TRIAL

12. Plaintiff demands a trial by jury.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, A. T., prays and respectfully requests that Defendants be cited to appear and answer and that upon trial, this Court enter a judgment in favor of Plaintiff against Defendants in an amount within the jurisdictional limits of this Court, and for such other and further relief, both general and special, at law and in equity, to which Plaintiff may be justly entitled.

Respectfully submitted:

FRIEDMAN & FEIGER, LLP

By: /s/ Lawrence J. Friedman
Lawrence J. Friedman
State Bar No. 07469300
lfriedman@flawoffice.com

5301 Spring Valley Road, Suite 200
Dallas, Texas 75254
Telephone (972) 788-1400
Facsimile (972) 788-2667

AND

JEFFREY T. HALL
ATTORNEY AT LAW

By: /s/ Jeffrey T. Hall
Jeffrey T. Hall
State Bar No. 00787622
jthallesq@gmail.com

2200 Ross Avenue, Suite 5350
Dallas, Texas 75201
Telephone (214) 658-6513
Facsimile (214) 658-6509

ATTORNEYS FOR PLAINTIFF

PLAINTIFF'S ORIGINAL PETITION

